

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Autoscribe Corporation	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case No.: 2:24-cv-00325
	§	
Nuvei Corporation, Nuvei Technologies	§	JURY TRIAL DEMANDED
Corporation, and Nuvei Technologies, Inc.	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONSE TO
DEFENDANTS’ RULE 12(b)(2) MOTION TO DISMISS**

Plaintiff Autoscribe Corporation respectfully request an extension of time to file its response to Defendants Nuvei Corporation, Nuvei Technology Corporation, Nuvei Limited, and Nuvei International Group Limited’s Rule 12(b)(2) Motion to Dismiss [Dkt No. 41]. In support of this motion, Autoscribe shows as follows:

1. On December 2, 2024, the Nuvei Defendants filed their Rule 12(b)(2) Motion to Dismiss [Dkt. No. 41].
2. Autoscribe moves to compel additional discovery from the Nuvei Defendants related to the jurisdictional allegations Nuvei Limited and Nuvei International Group Limited raised in the Motion to Dismiss concurrently with the filing of this motion.
3. On December 13, 2024, Autoscribe and the Nuvei Defendants conferred over Autoscribe’s request for jurisdictional discovery. The Nuvei Defendants stated they were unopposed to Autoscribe’s request to extend its time to respond to the Nuvei Defendants’ Motion to Dismiss until either (1) if the Court grants Autoscribe’s

motion to compel, 14 days after all compelled discovery is produced, or (2) if the Court denies Autoscribe's motion to compel, 14 days after the Court's Order denying Autoscribe's motion to compel.

4. The present request is not offered for the purpose of delay or tactical advantage, but rather to ensure Autoscribe is not prejudiced by responding to Nuvei's Motion to Dismiss without a ruling on Autoscribe's motion to compel related jurisdictional discovery.

The Nuvei Defendants are unopposed to this request. Therefore, Autoscribe respectfully requests that the Court grant the present motion and enter the attached proposed order.

Dated: December 15, 2024

Respectfully submitted,

/s/ Jason McManis

Jason McManis (SBN# 24088032)

Colin Phillips (SBN# 24105937)

Chun Deng (SBN# 24133178)

Angela Peterson (SBN# 24137111)

Michael Killingsworth (SBN# 24110089)

Ahmad, Zavitsanos & Mensing, PLLC

1221 McKinney Street, Suite 2500

Houston, Texas 77010

(713) 655-1101

jmcmanis@azalaw.com

cphillips@azalaw.com

cdeng@azalaw.com

apeterson@azalaw.com

mkillingsworth@azalaw.com

Andrea L. Fair (SBN# 24078488)

Ward, Smith, & Hill, PLLC

1507 Bill Owens Parkway

Longview, Texas 75604

(903) 757-6400

(903) 757-2323 (fax)

andrea@wsfirm.com

Attorneys for Autoscribe Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 15, 2024, a true and correct copy of the foregoing document was served via electronic delivery to all counsel of record.

/s/ Jason McManis

Jason McManis

CERTIFICATE OF CONFERENCE

The parties met and conferred on December 13, 2024, to discuss the relief requested in this Motion. This Motion is unopposed.

/s/ Jason McManis

Jason McManis